

ROLE OF THE FISH HEALTH PROFESSIONAL

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THE GAME IS CHANGING

- **1 JANUARY 2017 all antibiotic medicated feed applications will be through a Veterinary Feed Directive (VFD)**
- **Fish health professionals will have to work with a licensed veterinarian in that state to obtain a VFD**
- **For a VFD to be valid, it must be issued by a licensed veterinarian in the context of a valid vet-client-patient relationship**

VET-CLIENT-PATIENT RELATIONSHIP

- The veterinarian-client-patient relationship (VCPR) is the basis of professional supervision
- State and federal definitions of VCPR exist
 - State definitions may apply, but only if they meet the standards of a VCPR as defined in the Code of Federal Regulations
- FDA provides a list of states whose VCPR includes key elements of the federally defined VCPR
 - <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm460406.htm>

FEDERAL VCPR 21 CFR § 530.3(i)

A valid veterinarian-client-patient relationship is one in which:

- (1) A veterinarian has assumed the **responsibility for making medical judgments** regarding the health of (an) animal(s) and the need for medical treatment, and the client (the owner of the animal or animals or other caretaker) has agreed to follow the instructions of the veterinarian;
- (2) There is **sufficient knowledge of the animal(s)** by the veterinarian to initiate at least a general or preliminary diagnosis of the medical condition of the animal(s); and
- (3) The practicing veterinarian is **readily available for followup** in case of adverse reactions or failure of the regimen of therapy. Such a relationship can exist only when the veterinarian has recently seen and is personally acquainted with the keeping and care of the animal(s) by virtue of examination of the animal(s), and/or by medically appropriate and timely visits to the premises where the animal(s) are kept.

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An appropriate veterinarian/client/patient relationship will exist when:

01. **Responsibility.** The veterinarian has assumed the responsibility for making medical judgements regarding the health of the animal and the need for medical treatment, and the client (owner or other caretaker) has followed the instructions of the veterinarian.

02. **Medical Knowledge.** There is sufficient knowledge of the animal by the veterinarian to initiate at least a general or preliminary diagnosis of the medical condition of the animal. This means that the veterinarian has seen the animal within the last twelve (12) months or is personally acquainted with the keeping and care of the animal, either by virtue of an examination of the animal, or by medically appropriate visits to the premises where the animals are maintained within the last twelve (12) months.

03. **Availability.** The practicing veterinarian or designate is readily available for follow-up in case of adverse reactions or failure of the regimen of therapy.

DISCUSSION

- **Conference call with Grace Karreman (AVMA) and Thomas Loch (AFS-FHS)**
- **Proposal to allow AFS FHS certified professionals to work under a veterinarian's license**
- **Intention to expedite timely and compassionate application of antibiotic therapy to fish**

CONCLUSION

- **Must be a veterinarian writing VFD**
- **Develop tele-medicine to facilitate these treatments**
 - **Electronic signatures**
 - **Make detailed hatchery site maps (including GPS) and rearing system descriptions available (approx. 30 sites)**
 - **List of stocks on site**
 - **Water flows**
 - **Water chemistry**
 - **Etc...work with and educate veterinarians**

CASE STUDY NAMPA HATCHERY

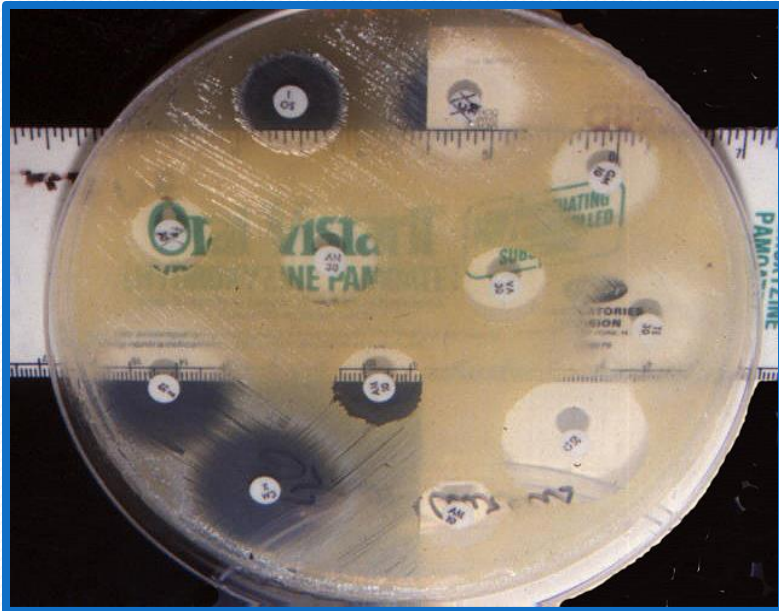


INITIAL OBSERVATIONS OF DISEASE

- **Nampa Fish Hatchery manager requests a diagnostic visit on 19 April 2016**
- **Observation of fish and on-site necropsy suggested cold water disease**
 - **Pale gills**
 - **Enlarged spleen**

DIAGNOSTIC APPROACH & RESULTS

- Collected samples for bacteriology and virology
- Checked for parasites
- Conducted FAT for *Flavobacterium psychrophilum*
 - FAT was strongly positive for *Fp*



GETTING THE VFD

- **Contacted Dr. Mark Drew (IDFG Wildlife Bureau)**
 - Advised Dr. Drew of situation, advised that a VFD for AQUAFLOX would be needed
 - Dr. Drew was in the field and unavailable
- **Contacted Dr. Debra Lawrence (ID Dept. of Agriculture)**
 - Advised Dr. Lawrence of situation
 - VFD issued 21 April 2016
- **2-3 days is the average turn-around time between fish observation and VFD issuance**
 - Depending on circumstances, longer delays are possible
- **With every antibiotic treatment being under VFD we will have more opportunity for delay**

CONCLUSIONS AND DISCUSSION POINTS

Turnaround should be adequate—concerned about
the exception

No extra-label use under VFDs

What about nontherapeutic uses (Marking)?

How are you handling this?